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Cooper/DC/USEPA/US@EPA, Tina Kaneen/DC/USEPA/US@EPA,
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Subject: Waste Quantities

Larry,



At our last meeting, CPMA asked EPA to describe the types of waste quantity information that might be useful in support of the current dyes and pigments listing determination, and, in particular, in our impact assessments of this effort. We appreciate your offer to determine whether you can be of assistance in this area. The attached document describes several formats that could be of use to us.

I've cc'ed ETAD and IACM on this transmittal to keep Tucker and John in the loop, as this is an outcome from our January 15th meetings on impacts.

Please let me know if you have any questions or would like to discuss this further.

Thanks,

Gwen

 
CPMA data request10.doc CPMA data request10.wp

Gwen DiPietro
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February 12, 2003

**Organic Dyes and Pigments Listing Determination
Azo, TAM and Anthraquinone Wastes¹**

**Selected Data of Interest
for the
Economic Assessment and Regulatory Flexibility Screening Analysis**

Background

Office of Solid Waste (OSW) personnel conducted two separate meetings with the Color Pigment Manufacturers Association (CPMA) and the Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD) of North America representatives on January 15, 2003. These outreach meetings were devised to discuss the Economic Assessment and Regulatory Flexibility Screening Analysis under development in support of the listing determination. One action item arising from this meeting was for OSW personnel to identify targeted data for use in the economic and small entity analyses. This discussion focused on data describing waste quantities and product prices. Data related to international competition were also discussed. CPMA offered to consider whether or not they could provide such information.

Data Format Options

As discussed in our meeting, the Agency would prefer to receive as detailed a level of data as possible. However, the Agency acknowledges that CPMA continues to have concerns about the confidential nature of certain types of information. Therefore, the Agency has described below two alternative formats for consideration. Data submitted under either of these alternatives would help us improve the quality of our analyses.

All data should be received by OSW no later than March 28, 2003 to ensure full consideration.

¹ Waste affected by this listing determination include the following solid or liquid waste generated from the production of any of the following classes of organic dyes, pigments, or FD&C colorants:

- * Azo/benzidine (including azo, monoazo, diazo, triazo, polyazo, azoic, benzidine, and pyrazolone),
- * anthraquinone (anthraquinone and perylene), or
- * triarylmethane (triarylmethane and triphenylmethane).

Alternative One: Waste Quantity Averages Based on Facility Stratification

Average annual quantities of affected wastes, by waste form (solids and liquids), within stratified facility groupings, covering all facilities identified on the final facilities table.¹

- Categorize all facilities into groups of similar size,
 - facility size stratification (categories) should be based on the annual quantity of affected waste generated, by waste form,
- Separate facility groups would be necessary for both solid and liquid wastestreams,
- Individual facilities in each group should be identified by name and address,
- To the extent possible, describe the degree to which waste quantity averages, for each group and waste type, represent mixtures with other wastes or reflect only "wastes of concern,"
- Describe the stratification methodology and any supporting statistical information.

Alternative Two: Refined Waste-to-Product Ratios

Updated and refined ratios reflecting waste quantity compared to production quantity, aggregated over all facilities identified in the final facilities table.²

- Two separate ratios are necessary:
 - * Average for all affected solids
 - * Average for all affected liquids
- The ratios for both solids and liquids would be most useful if developed and presented on the basis of tons of all targeted waste, per pound of all affected product types produced.
- Ideally, the ratios should reflect waste-to-product generation for only the affected products/wastes. Any non-affected products/wastes should be separated from the targeted quantities prior to ratio development,

In addition to the ratios, it would be most useful to receive the following:

²

To be provided by EPA.

Updated product pricing information, including:

- Current average price per unit of product, averaged across all affected products generating waste of concern,
 - This would ideally be a single weighted average price, incorporating all affected facilities and all affected product types,

Further refinements in the analysis could be accomplished if one of the following data items was received:

Aggregate annual quantity (in pounds for year 2002) of all affected product for each facility on the final facilities table,

or

Aggregate annual value³ (U.S. dollars for year 2002) of all affected product for each facility on the final facilities table.

³

In order to avoid potential distortions resulting from inventory carryover, we request value of annual production, not sales.

